



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

August 25, 2008

Mr. Mark Paris
Basic Remediation Company (BRC)
875 West Warm Springs
Henderson, NV 89011

Re.: Nevada Division of Environmental Protection Response to:
Sampling and Analysis Plan for the Western Hook Development Sub-Area
dated August 2008 (received August 18, 2008)
NDEP Facility ID# H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's document identified above and provides conditional approval for BRC to proceed with the implementation of the scope of work. NDEP outlines these conditions in Attachment A. In addition, the NDEP provides comments for BRC's consideration in the development of additional Sampling and Analysis Plans.

Should you have any questions or concerns, please do not hesitate to contact me at (702) 486-2850 x247 or brakvica@ndep.nv.gov.

Sincerely,

Brian A. Rakvica, P.E.
Supervisor, Special Projects Branch
Bureau of Corrective Actions

BAR:s

cc: Jim Najima, NDEP, BCA, Carson City

Barry Conaty, Holland & Hart LLP, 975 F Street, N.W., Suite 900, Washington, D.C. 20004
Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5,
75 Hawthorne Street, San Francisco, CA 94105-3901
Ebrahim Juma, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-1741
Girard Page, Clark County Fire Department, 575 East Flamingo Road, Las Vegas, Nevada 89119
Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011
David Sadoff, AIG Consultants, Inc., 121 Spear Street, 3rd Floor, San Francisco, CA 94105
Leslie Hill, U.S. Department of Justice, PO Box 23896, Washington, DC 20026-3986
Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409
Nicholas Pogoncheff, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato, CA 94947-7021
Susan Crowley, Tronox, PO Box 55, Henderson, Nevada 89009
Keith Bailey, Environmental Answers, 3229 Persimmon Creek Dr, Edmond, Oklahoma 73013
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, Co 80402
Michael Bellotti, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312
Curt Richards, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312
Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California 95209
Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380, Bainbridge Island, WA 98110
Deni Chambers, Northgate Environmental Management, Inc., 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA 94612
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Michael Ford, Bryan Cave, One Renaissance Square, Two North Central Avenue, Suite 2200, Phoenix, AZ 85004
Paul Black, Neptune and Company, Inc., 8550 West 14th Street, Suite 100, Lakewood, CO 80215
Teri Copeland, 5737 Kanan Rd., #182, Agoura Hills, CA 91301
Brian Giroux, McGinley and Associates, 425 Maestro Drive, Suite 202, Reno, NV 89511
Paul Hackenberry, Hackenberry Associates, LLC, 550 W. Plumb Lane B425, Reno, NV 89509

Attachment A

1. Section 2.1, pages 2-1 through 2-3, the description of the storm water channel is inadequate. This channel conveys groundwater as well as storm water. The groundwater is contaminated with perchlorate and a variety of other contaminants. It is the understanding of the NDEP that this channel regularly discharges to the Western Hook Sub-Area. BRC needs to consider how this issue will be addressed in terms of closure of this sub-area. **It is expected that this issue will be discussed between the NDEP and BRC in parallel with the implementation of this SAP.**
2. Section 2.2, page 2-3, similar to the comment provided above, the description of the storm water channel is inadequate. **No response is necessary for this comment.**
3. Section 4.0, general comment, it is requested that BRC collect a sample of the water being discharged onto the Western Hook sub-area by the storm water channel. It is suggested that this sample be analyzed for a broad suite of analytes. BRC should consider collecting samples from this discharge on a periodic basis (perhaps quarterly) until a resolution to this issue is agreed upon. **Please advise the NDEP if BRC concurs with this addition to the Scope of Work. If BRC concurs no response is necessary and this issue should be addressed during implementation of the SAP.**
4. Appendix A, Response-to-Comments (NDEP Comments dated August 5, 2008), the NDEP has the following comments:
 - a. Response-to-Comment (RTC) 9, it is still not clear what the "1%" is referring to. It appears that BRC is stating that these samples were less than 1% by volume? **Please clarify this issue in future Deliverables. No response is necessary for this comment.**
 - b. RTC 14, regarding the Data Quality Objectives (DQOs) section of this SAP, NDEP appreciates the time that BRC has spent developing this Section. To alleviate BRC's concerns about iterations of revisions of this Section and to alleviate the NDEP's concerns regarding the completeness of this Section, NDEP is drafting a red-line mark up of the DQOs for use in future SAPs. **No response is necessary for this comment.**
 - c. RTC 15, same as RTC 14. **No response is necessary for this comment.**
 - d. RTC 17, same as RTC 14. **No response is necessary for this comment.**